



ABRAHAM J. ZAGER (1941-1999)
LAWRENCE M. FUCHS (1970-2020)
ANDREW W. KRANTZ
MICHAEL T. WARSHAW*
KEVIN I. ASADI
LYNN E. STAUFENBERG**
JASON L. WYATT♦

ARTHUR L. CHIANESE, OF COUNSEL
SUSAN L. GOLDRING, OF COUNSEL
ALBERT A. ZAGER, OF COUNSEL

*ADMITTED TO THE NEW YORK BAR
CERTIFIED AS ARBITRATOR AND MEDIATOR, R.1:40

**ADMITTED TO THE PENNSYLVANIA BAR
QUALIFIED FAMILY LAW MEDIATOR
REGISTERED GUARDIAN

♦ LL.M. IN TAXATION

March 31, 2025

Hon. Jamel K. Semper, U.S.D.J.
Frank R. Lautenberg U.S. P.O & Courthouse
2 Federal Square,
Courtroom PO 03
Newark, New Jersey 07101

Re: Vision Industries Group, Inc. v. ACU Plasmold, Inc.
Case No.: 2:18-cv-06296

Dear Judge Semper:

As you know, we represent the defendant in this matter. Pursuant to the Court's Text Order [Doc 288] dated November 8, 2024, Defendant hereby submits the following:

1. Motion in Limine to Exclude Evidence of Defendant ACU Refusing Orders;
2. Motion in Limine to Exclude Evidence of Lost Future Sales to the "Seven Customers";
3. Motion in Limine to Exclude Evidence of Defendant's Alleged Extortion;
4. Motion in Limine to exclude any evidence of defendant acu violating the exclusivity provision of the contract;
5. Defendant's Proposed Charges;
6. Defendant's Exhibit List and Exhibits;
7. Defendant's Trial Brief.

Thank you for your consideration in this matter.

Respectfully submitted,
/s/ Edward W. Miller
821 Franklin Ave. Suite 209
Garden City, New York 11530
(917) 770-9016
Attorneys for Defendant ACU

/s/ Michael T Warshaw
Michael T. Warshaw, Esq.
For the firm
Local Counsel for defendant, ACU

